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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 15-0582-WHO
)	
Plaintiff,)	UNITED STATES' EXHIBIT LIST
)	
v.)	Pretrial Conference: Aug. 13, 2018
)	Time: 2:00 P.M.
ADAM SHAFI,)	Court: Hon. William H. Orrick
)	Courtroom: No. 2, 17 th Floor
Defendant.)	
)	

The United States hereby provides notice of its intent to offer into evidence or to use the following exhibits, or the tangible items reflected therein, at the trial of the above-captioned case. Some exhibits will be used to refresh recollection or as past recollection recorded, or for similar purposes.

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1 The government reserves the right to amend the list prior to and during trial as necessary.

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3 Dated: July 30, 2018

Respectfully submitted,

4 ALEX G. TSE
5 Acting United States Attorney

6 /s/ Elise LaPunzina
7 S. WAQAR HASIB
8 ELISE LAPUNZINA
9 Assistant United States Attorneys
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GOVERNMENTS' EXHIBIT LIST

EXHIBIT	DESCRIPTION	BATES NUMBER
1	Audio call, 5103662789 2015-06-03 03-45-42 00063-001	
2	Audio call, 5103662789 2015-06-05 04-10-33 00101-001	
3	Audio call, 5103662789 2015-06-05 09-41-09 00102-001	
4	Audio call, 5103662789 2015-06-08 18-31-30 00226-001	
5	Audio call, 5103662789 2015-06-17 00-26-25 00497-001	
6	Audio call, 5103662789 2015-06-18 04-37-28 00567-001	
7	Audio call, 5103662789 2015-06-24 00-09-58 00872-001	
8	Audio call, 5103662789 2015-06-24 00-49-55 00874-001	
9	Audio call, 5103662789 2015-06-26 22-55-19 00977-001	
10	Audio call, 5103662789 2015-07-01 03-42-24 01170-001	
11	Audio call, 5103662789 2015-07-01 21-32-46 01189-001	
12	Audio call, 5206651843 2015-02-15 06-13-46 01544-001	
13	Audio call, 5206651843 2015-01-03 03-38-47 00362-001	
14	Audio call, 5206651843 2015-03-11 01-55-07 02159-001	
15	Audio call, 5206651843, 2015-07-01 04-05-30 05409-001	

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EXHIBIT	DESCRIPTION	BATES NUMBER
16	Federal Register, Volume 79, No. 94, Thursday, May 15, 2014, In the Matter of the Designation of ANF as FTO	AS-03202 – AS-03204
17	Transcript of audio call, 5103662789 2015- 06-03 03-45-42 00063-001	PROTECTED_002431 – PROTECTED_002463
18	Transcript of audio call, 5103662789 2015- 06-05 04-10-33 00101-001	PROTECTED_002413 – PROTECTED_002420
19	Transcript of audio call, 5103662789 2015- 06-05 09-41-09 00102-001	PROTECTED_005877 – PROTECTED_005909
20	Transcript of audio call, 5103662789 2015- 06-08 18-31-30 00226-001	PROTECTED_006039 – PROTECTED_006091
21	Transcript of audio call, 5103662789 2015- 06-17 00-26-25 00497-001	PROTECTED_005910 – PROTECTED_005913
22	Transcript of audio call, 5103662789 2015- 06-18 04-37-28 00567-001	PROTECTED_005914 – PROTECTED_005924
23	Transcript of audio call, 5103662789 2015- 06-24 00-09-58 00872-001	PROTECTED_005925 – PROTECTED_005941
24	Transcript of audio call, 5103662789 2015- 06-24 00-49-55 00874-001	PROTECTED_005942 – PROTECTED_005947
25	Transcript of audio call, 5103662789 2015- 06-26 22-55-19 00977-001	PROTECTED_005948 – PROTECTED_005955
26	Transcript of audio call, 5103662789 2015- 07-01 03-42-24 01170-001	PROTECTED_005956 – PROTECTED_005967
27	Transcript of audio call, 5103662789 2015- 07-01 04-05 32 01180-001	PROTECTED_005970 - PROTECTED_005975
28	Transcript of audio call, 5103662789 2015- 07-01 21-32-46 01189-001	PROTECTED_005976 – PROTECTED_006016
29	Transcript of audio call, 5206651843 2015- 02-15 06-13-46 01544-001	PROTECTED_006092- PROTECTED_006113
30	Transcript of audio call, 5206651843 2015- 01-03 03-38-47 00362-001	PROTECTED_006035 - PROTECTED_006038
31	Transcript of audio call, 5206651843 2015- 03-11 01-55-07 02159-001	PROTECTED_006125 - PROTECTED_006129

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EXHIBIT	DESCRIPTION	BATES NUMBER
32	Transcript of Audio call, 5206651843, 2015-07-01 04-05-30 05409-001	PROTECTED_002522 - PROTECTED_002527
33	Summary exhibit: Arabic terms	PROTECTED_005969
34	Google Subscriber and session information for reflexatratron@gmail.com, 2014	AS- 0420 – AS-00441
35	Google Subscriber and session information for reflexatratron@gmail.com, 2014	AS-00527 – AS-00540
36	Google records CD	PROTECTED_005564
37	Google certificate of authenticity, reflexatratron account records	AS-00417 – AS-00419
38	Google and YouTube certificate of authenticity for multiple accounts, including browsing and watch histories, 8/7/17	AS-04063 – AS-04073
39	FBI 302 of Google search history, 11/2/17	AS-03508- AS-03520
40	FBI 302 of Google YouTube search history, 11/2/17	AS-03500 – AS-03507
41	FBI 302 of translation of Arabic Google searches conducted by reflexatratron@gmail.com, 3/31/15 – 7/3/15	AS-03545 – AS-03566
42	T-Mobile cell phone records	AS-00457 – AS-00526
43	T-Mobile CD, subscriber and file data records, June to Nov 2014 (excel format)	AS-00616
44	Yahoo! A.N. records	PROTECTED_000062
45	Yahoo! A.N. account certificate of authenticity, 12/14	AS-04077 – AS-04078
46	A.N. email note, 5/27/14	AS-04119

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EXHIBIT	DESCRIPTION	BATES NUMBER
47	Shafi email to S.K. with back packing list, 7/13/2014	PROTECTED_006131- PROTECTED_006132
48	Second Shafi email to S.K. with back packing list, 7/13/2014	PROTECTED_006133
49	Shafi email to A.N. with back packing list, 8/2/2014	PROTECTED_06138 – PROTECTED_03169
50	Student Universe email to Shafi, A.N. and S.K., 8/9/2014	PROTECTED_006134 – PROTECTED_006135
51	CheapoAir flight receipt to Shafi, 8/15/2014	PROTECTED_006136 – PROTECTED_006137
52	American Citizen Services Unit, Client Worksheet, 8/17/2014	AS-03653 – AS-03657
53	FBI Report, U.S. Embassy Egypt Walk-in S. 8/9/2017	AS-02409 – AS-02414
54	FBI 302, Interview of Adam Shafi, 9/4/2014	AS-00001 – AS-00002
55	FBI 302, Interview of S.S., 9/4/2014	AS-00003 – AS-00004
56	FBI 302, Interview of A.N., purpose of travel to Turkey, 9/29/2014	AS-00008 – AS-00009
57	FBI 302, CBP Report of A.N. interview upon re-entry to U.S., 9/29/2014	AS-00545– AS-00546
58	Santa Clara County Sheriff's Office Inmate visitor log with A.H.	AS-02408
59	FBI 302 of Adam Shafi at SFO, 4/1/2015	AS-00153 – AS-00161
60	FBI 302 of J.N., 6/30/2015	AS-00162 – AS-00164
61	FBI 302 of Shafi on date of arrest, 7/3/2015	AS-00165 – AS-00167
62	FBI 302, Interview of S. S., 7/3/2015	AS-02038 – AS-02040

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EXHIBIT	DESCRIPTION	BATES NUMBER
63	FBI 302 of evidence seized at 560 Pilgrim Loop, Fremont, CA, 7/6/2015	AS-00609 – AS-00613
64	Pictures from search on car and residence, 7/3/15	AS- 00026 – AS-00137, 140
65	Evidence log, photo log, diagrams from search, 7/3/15	AS-00141 – AS- 00152
66	FBI 302 of translations of items found during Shafi search	AS-02992 – AS-02999
67	FBI 302, Telephone Interview of FBI Linguist Marion L. Butros, 7/28/18	AS-04081
68	Royal Jordanian Records and certificate of authenticity, 4/18/2016	AS-04074 – AS-04076
69	Target Masters Receipts, 4/1/2015	AS-02941 – AS-02944
70	Transcript of Audio Transcription of Jail Visit Recording, (0:00 to 0:0020) (2:34:45 – 3:16:24), 5/21/2016	AS-03092 – AS-03126
71	Transcript of Audio Transcription of Jail Visit Recording (0:00:00 to 0:0020) (1:58 – 2:39:40), 6/4/2016	AS-03127 – AS-03155
72	Transcript of Audio Transcription of Jail Visit Recording (0:00:00 to 0:0020) (2:10:30 – 2:43:00), 10/2//2016	AS-03156 – AS-03200
73	Items in Shafi's possession at SFO, 6/30/2015	AS-00617 – AS-00623
74	CD, Digital Evidence Review (includes various photos) The Constants of Jihad Lecture (6 mp3 audios) and Samsung Galaxy Phone Records	AS-00624
75	Bank of America Receipt showing \$2400 cash withdrawal on 6/30/15	AS-00757
76	Handwritten notes from small memo pad	AS-00758 – AS-00759

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EXHIBIT	DESCRIPTION	BATES NUMBER
77	Small notepad – Arabic handwritten notes and translation	AS-00761 – AS-000762
78	Large notebook – handwritten notes; small notebook – handwritten notes	AS-00785 – AS-00895
79	Pictures of visa, passport, and passport photo	AS-00885 – AS-00902
80	Wells Fargo Bank – S.K. bank records showing Turkey e-Visa purchases, Royal Jordanian ticket purchase and CheapoAir transaction	AS-01048 – AS-01082
81	S.K. records and imaged phone, including call history and social media accounts	AS-01194 – AS-01242
82	Shafi's Galaxy S4 data, including text messages	AS-01248 – AS-01292
83	CD, A.N. iPhone records	PROTECTED_000097
84	AT&T records (A.N.)	AS-01325 – AS-01639
85	Bank of America checking account	AS-02431 – AS-02528
86	Bank of America financial transaction on 1/10/14	AS-02485
87	Bank of America financial transactions on 10/20/14	AS-02441
88	Bank of America financial transaction on 6/2/15	AS-02475
89	Bank of America, affidavit of authenticity	AS-04062
90	CD of A.H./Shafi jail call file, Santa Clara County Sheriff's Office	AS-02985
91	Alameda County Sheriff's Office Visiting Report, 3/1/16 – 6/9/2016	AS-03000 – AS-03003

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EXHIBIT	DESCRIPTION	BATES NUMBER
92	Alameda County Sheriff's Office Visiting Report, 6/1/2016 – 9/1/2016	AS-03011 – AS-03014
93	CD of Jail Files (Shafi) (510) 366-6091 (129); (510) 366-3090 (9), 3/3/16 to 6/2/16	AS-03004
94	Glenn Dyer Booth 5 10/2/16 CD; #1 A.N., 2:10 – 2:43; #2 Shafi Family 3:37 – 4:17	AS-03008
95	AMEX Records	AS-00185 – AS-00414
96	AMEX transaction, 6/5/14	AS- 00226
97	AMEX transaction, 8/17/14	AS-03219
98	AMEX transaction, 10/23/14	AS- 02652
99	AMEX records	AS-02643 – AS-02720
100	AMEX, certificate of authenticity, 12/14	AS-04061
101	AMEX, certificate of authenticity 7/15	AS-02643 – AS-02720
102	CART records of MacBook hard drive	AS-03258 – AS-03276
103	FBI 302 of YouTube access history from laptop, 6/21/2017	AS-03456 – AS-03462
104	FBI 302 of reflexatron@gmail.com YouTube search history, 2012-2015	AS-03500 – AS-03507
105	FBI 302 of translation of Arabic YouTube Searches, 3/23/15 – 6/29/15	AS-03538 – AS-03544
106	FBI 302, forensic process of Apple Mac desktop, 1/12/18	AS-03567 – AS-03568
107	CD of Macbook Mirror image Forensic Review, 12/1/17, 1/28/18	AS-03636

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EXHIBIT	DESCRIPTION	BATES NUMBER
108	CD and index of Declassified Audio 1 CD	PROTECTED_000063 – PROTECTED_000069
109	CD of Declassified Audio 2	PROTECTED_000070
110	CD and index of Declassified Audio 3 CD	PROTECTED_000073 – PROTECTED_000083
111	Corrected Audio Index for CD 2	PROTECTED_000084 – PROTECTED_000085
112	Shafi-A.H. jail call transcript, 3/15/15	PROTECTED_003855 – PROTECTED_003897
113	Text message from A.S. to A.N., 5/31/15	PROTECTED_006130
114	Summary exhibit: map	AS-04079
115	CD, Google YouTube Searches, 2014-2015	AS-04082
116	Translations of items found during search, 7/23/18	AS-04108 – AS- 04118
117	FBI 302 with analysis of Yahoo! A.N. records, 12/18/14	PROTECTED_000087- PROTECTED_000091
118	Summary exhibit: Shafi Timeline	AS-04083 – AS-04104
119	Photos of writings in Shafi's bedroom on day of search	AS-03662 – AS-03663
120	Shafi passport	
121	Item hanging in Shafi's room containing writings in Arabic	
122	Credit card receipt for tourism charge in Istanbul on 8/17/14 found during search	
123	Boarding pass for Royal Jordanian found during search	

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EXHIBIT	DESCRIPTION	BATES NUMBER
124	Email from Shafi to his father confirming ownership of reflexatron gmail account, 10/5/12	PROTECTED_006140
125	Translations of items found during search, 7/23/18	AS -04105 – AS-04107
126	FBI TICTU Certification, 7/18/18	AS-04057 – AS-04060